



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 24, 2022

**BY EMAIL**

The Honorable Jed S. Rakoff  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007

Re: ***United States of America v. Sequan Jackson, 22 Cr. 352 (JSR)***


Dear Judge Rakoff:

The Government writes to object to Jackson's request to be released on bail subject to home confinement and video monitoring. Putting aside the Government's concern about the efficacy of Jackson's proposal, Pretrial Services—the sole entity that could monitor the video feed—has confirmed that it does not conduct this type of supervision for any of its supervisees, does not have the resources to conduct such supervision, and would not consent to do so in this case. Accordingly, the proposed bail modification is effectively meaningless, and would do nothing to address the danger to the community and concerns about witness intimidation that the Government raised at the bail hearing on Friday.

Furthermore, Pretrial Services confirmed that, apart from being able to monitor the websites that a supervisee visits, it does not have the capability or resources to monitor a supervisee's communications over the internet or telephone (mobile or otherwise).

Respectfully submitted,

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by:   
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cc: Susan Kellman, Esq. (By Email)